

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
Northern Division**

**THOMAS SOLOMON VANN, JR.**

**PLAINTIFF**

**V.**

**Civil Action No. 3:21-cv-00305-DPJ-ASH**

**THE CITY OF MERIDIAN, MISSISSIPPI,  
DEBORAH NAYLOR-YOUNG, in her  
individual capacity, PATRICK GALE, in  
his individual capacity, and CHRIS  
READ, in his individual capacity,**

**DEFENDANTS**

**RESPONSE TO MOTION to WITHDRAW COUNSEL**

Comes now the Plaintiff's attorney, James A. Williams, and files his Response to the Defendant's Motion to Withdraw Counsel(*Doc. # 84*) as follows:

1. Plaintiff's attorney, respectfully submits, he cannot respond to the details of the Motion because of his duties and obligations under the Professional Rules of Conduct regarding non-disclosure of the historical activities of the attorney-client relationship.

2. Plaintiff's attorney, however, because of what he perceives as a venomous attack by Mr. Vann, has to say that the attorney-client relationship has been severely damaged to the point that he concludes that Mr. Vann's Motion should be granted.

Respectfully submitted,

s/James A. Williams  
James A. Williams, MB # 7270  
Attorney for Plaintiff  
P.O. Box 5002  
Meridian, Ms 39302-5002  
Phone: 601-693-3881  
Facsimile: 601.693.3873  
e-mail: [jwilliamslaw@bellsouth.net](mailto:jwilliamslaw@bellsouth.net)

**Certificate of Service**

The undersigned certifies that this date he has  
has served the Plaintiff Mr. Vann with a true copy of the above **Response to Motion to  
Withdraw Counsel** by email transmission to his email address of [vannts.tv@gmail.com](mailto:vannts.tv@gmail.com)

and further filed same in the CM/ECF and it has served a true copy upon the attorneys for  
Defendants:

Joshua W. Stover

Winston Lee

BURR & FORMAN, LLP

190 East Capitol Street, Suite M-100

Jackson, Mississippi 39201

Email: [Jstover@burr.com](mailto:Jstover@burr.com)

Kermit L. Kendrick

BURR & FORMAN, LLP

420 North 20th Street, Suite 3400

Birmingham, Alabama 35203

Email: [kkendrick@burr.com](mailto:kkendrick@burr.com)

So certified this the 26th day of March, 2025.

s/James A. Williams  
James A. Williams, MB # 7270  
Attorney for Plaintiff